

September 17, 2021

Elizabeth Adams, Director, Air and Radiation Division, Region 9  
U.S. Environmental Protection Agency  
75 Hawthorne Street, AIR-7  
San Francisco, California 94105  
[Adams.Elizabeth@epa.gov](mailto:Adams.Elizabeth@epa.gov)

Dear Director Adams:

The California Air Resources Board (CARB) is submitting final documentation for 2018 exceptional events that occurred in the ozone nonattainment areas of the entirety of Calaveras County, the Chico Metropolitan Statistical Area (MSA) in Butte County, the Sutter Buttes in Sutter County, Tuolumne County, the Tuscan Buttes in Tehama County, and the Western Portion of Nevada County. CARB requests that the U.S. Environmental Protection Agency (U.S. EPA) concur that the document accompanying this request supports the flagging of ozone exceedances in these areas as natural or exceptional events due to wildfire smoke impacts from numerous fires in the State of California.

Unusually high ozone concentrations, exceeding the 2008 8-hour national ambient air quality standard of 75 ppb in the Western Portion of Nevada County, and the 2015 8-hour national ambient air quality standard of 70 ppb in the entirety of Calaveras County, the Chico MSA in Butte County, the Sutter Buttes in Sutter County, Tuolumne County, and the Tuscan Buttes in Tehama County, were recorded in the summer of 2018. The analyses and data presented in the enclosed document for 2018, along with analyses and data to be presented in an upcoming document for 2020, demonstrate that without the impacts from wildfire smoke, the 2020 8-hour ozone design value for these areas would have been below the standards.

The 30-day public comment period required by 40 CFR 50.14(c)(3)(v) will begin on September 17, 2021 and will be completed by October 18, 2021. CARB is requesting parallel processing under U.S. EPA's procedure cited in 40 CFR 51, appendix V, section 2.3. Parallel processing is needed to expedite U.S. EPA action regarding the attainment status of the entirety of Calaveras County, the Chico MSA in Butte County, the Sutter Buttes in Sutter County, Tuolumne County, the Tuscan Buttes in Tehama County, and the Western Portion of Nevada County. Any comments received during the public comment period, as well as responses by CARB, will be submitted to U.S. EPA at the earliest possible date.

On October 3, 2016, U.S. EPA revised the *Treatment of Data Influenced by Exceptional Events* rule that allows data to be flagged and excluded from consideration by U.S. EPA when making decisions related to the attainment status of an area (81 FR 68216). This rule requires that states submit documentation to support the initial flagging to the appropriate U.S. EPA Regional Office.

If you have any questions regarding the enclosed documentation, please contact Sylvia Vanderspek, Chief, Air Quality Planning Branch, at (916) 324-7163 or via email at [sylvia.vanderspek@arb.ca.gov](mailto:sylvia.vanderspek@arb.ca.gov).

Sincerely,



Michael Benjamin, D. Env., Division Chief, Air Quality Planning and Science Division

Enclosure

cc: (With enclosure)

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